



ORIGINAL



0000130551

RECEIVED

October 17, 2011

2011 OCT 18 P 12:48

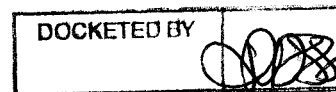
Arizona Corporation Commission

DOCKETED

OCT 18 2011

Docket Control  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

AZ CORP COMMISSION  
DOCKET CONTROL



RE: Comments on Southwest Gas Corporation 2012 EE & RET Implementation Plan –  
Docket – G-01551A-11-0344

Dear Chairman Pierce, Commissioner Kennedy, Commissioner Burns, Commissioner Newman,  
Commissioner Stump:

Easy Energy appreciates the opportunity to comment on the 2012 Southwest Gas (SW Gas) Energy Efficiency and Renewable Energy Technology Plan. I urge the Commissioners to approve the components of this plan as it offers a realistic and achievable plan to increase efficiency and encourage greater solar thermal adoption at a reasonable cost to ratepayers. Following are specific comments relating to the benefits of Commercial Combined Heat and Power (CHP) and Commercial Solar Thermal technologies as well as Easy Energy's recommendation on qualifying purchase options.

CHP – Smarter Greener Better Distributed Generation

Easy Energy applauds SW Gas for incorporating a CHP rebate program into its 2012 Implementation Plan. This high efficiency technology is an excellent fit for master metered multi-family housing, senior living centers, and hotels, all of which have a constant thermal load for domestic water heating combined with a significant electrical load. With this technology, the same therm of natural gas can be used to produce prime power (electricity) as well as provide heat for water heating applications, which can drive efficiency to 80% or more. In the summer months when utility electrical loads can approach over-capacity, these generators offer stable and reliable electrical generation onsite and can free up electrical grid capacity for other customers. Widespread adoption of CHP in appropriate commercial applications would lessen the growing need for "peaker" plants to meet electrical demand and make more efficient use of each therm of natural gas consumed at a customer site.





### Commercial Solar Thermal – Proven Renewable Energy Technology

Easy Energy has developed and installed 28 commercial solar thermal projects in Arizona over the last three years and every one of those projects has displaced natural gas use in a boiler for domestic water heating on site. Solar thermal systems deliver efficiencies of 55% or more and perform exceptionally well in the sunny Arizona climate. Unlike solar Photovoltaic (PV) technology, solar thermal does not degrade during the long and hot summer days, but instead maximizes the solar harvest by storing the daytime heat in water storage vessels for use after the sun sets. This renewable and highly efficient thermal technology is well received by commercial entities including multi-family housing, senior living centers and hotels because of the relative affordability to install and ease to maintain over the system's 20+ year lifetime.

The success and popularity of solar thermal systems is well documented on the AZ Goes Solar website. Based on Easy Energy's experience surrounding commercial solar thermal installations in Arizona, the proposed rebate budget of \$350,000 should be more than tripled to \$1,000,000 annually to adequately serve both the residential and commercial segments. If an increase to this budget is not possible, Easy Energy requests the Commission to grant SW Gas the ability to allocate more funds to this program from other under-performing measures in the Plan.

### Financing Option

Throughout the 2012 SW Gas Implementation Plan, it is stated that installed equipment must be purchased and not leased and that payment be made directly to the customer. Based on our experience in developing commercial thermal projects during the last 3 economically challenging years, we ask that the Commission allow SW Gas customers to assign rebate payments to the installer or financing institution, without regard to the financing structure used by the customer. The Leasing model has been well received by business owners who prefer to keep cash on hand and assign the incentives to a third party lender in exchange for a monthly payment and minimal upfront cost. This model is necessary in today's marketplace to continue the widespread deployment of solar thermal and high efficiency equipment in a cash-strapped economy.

In closing, I urge the Commissioners to adopt the SW Gas 2012 Implementation Plan to encourage greater efficiency and promote highly efficient solar thermal technologies throughout Arizona. Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Brian S. Bartel". The signature is fluid and cursive, with the first name "Brian" being more prominent than the last name "Bartel".

Brian Bartel  
Managing Member

